


**HURWITZ & FINE, P.C.**  
**ATTORNEYS AT LAW**

This request is granted. Motions shall be due January 28, 2022, opposition papers shall be due by February 28, 2022, and replies by March 7, 2022.

**Ryan P. Maxwell**  
rpm@hurwitzfine.com

**SO ORDERED.**  
Date: January 12, 2022  
New York, New York  
January 11, 2022

  
**JOHN P. CRONAN**  
United States District Judge

**VIA ECF**

Hon. John P. Cronan  
United States District Judge  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

RE: *New South Insurance Company v. Capital City Movers LLC, et al*  
Case No.: 1:20-cv-04087-JPC  
Our File No.: 20200246

Dear Judge Cronan:

We are counsel for Plaintiff, New South Insurance Company (“New South”), in the above-captioned matter and, along with counsel for Defendant, David Brown, request that the Court accept this correspondence as a joint request for a two-week extension of time of the briefing schedule as set forth in the Court’s memo endorsement (Doc. #60) for the filing of motions, opposition papers and replies.

Per this Court’s memo endorsement (Doc. #60), all motions are to be filed by January 14, 2022, oppositions by February 14, 2022, and replies by February 21, 2022.

The parties are jointly stipulating to facts and are working through finalizing those facts, which will be incorporated into our briefs. To facilitate finalization, we respectfully request that the filing deadline for motions be extended to January 28, 2022, opposition papers shall be due by February 28, 2022, and replies by March 7, 2022.

Hon. John P. Cronan  
United States District Judge  
United States District Court  
Southern District of New York  
January 11, 2022  
Page 2

Thank you for your attention to this matter. If the Court has any questions, we are available at your convenience.

Respectfully submitted,

HURWITZ & FINE, P.C.

A handwritten signature in blue ink, appearing to read "Ryan P. Maxwell", is written over a light blue rectangular background.

Ryan P. Maxwell

RPM:krk  
cc: All Defendants' Counsel  
(Via ECF)